

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department on its own motion to determine the need for new area codes in eastern Massachusetts and whether measures could be implemented to conserve exchange codes within eastern Massachusetts.

D. T. E. 98-38

SECOND SET OF INFORMATION REQUESTS TO THE ATTORNEY GENERAL FROM AT&T AND AT&T WIRELESS SERVICES

AT&T Communications of New England, Inc., and Wireless PCS, Inc., a wholly-owned subsidiary of AT&T Wireless Services, Inc., d/b/a AT&T Wireless Services, hereby submit the following requests to the Attorney General.

INSTRUCTIONS

1. Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.
2. These requests shall be deemed continuing so as to require supplemental responses if the Attorney General subsequently receives or becomes aware of additional information responsive to these requests.
3. If an answer refers to the Attorney General's response to another information request in this proceeding, please provide the text of that response with the answer.
4. If the Attorney General cannot answer a request in full, answer to the extent possible and state why The Attorney General cannot answer the request in full.

INFORMATION REQUESTS

According to a subtitle in Dr. Selwyn's Rebuttal Testimony dated October 29, 1999, Dr. Selwyn believes that "[t]here is still time to implement rate center consolidation prior to the exhaust of the four eastern Massachusetts area codes" (see p.5), despite Dr. Selwyn's recognition that area code exhaust is expected to begin happening "in the first quarter of 2001" in the 617 NPA and shortly thereafter in the 508, 781, and 978 NPAs (see p.10, n.14). Dr. Selwyn has advocated either a "Single Rate Center" ("SRC") plan or a 25-rate center "Regional Call Plan" ("RCP") for the eastern Massachusetts LATA. Please provide Dr. Selwyn's best estimate as to the number of months that the currently anticipated NXX code exhaust dates for each

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of the 508, 617, 781, and 978 NPAs would be extended as a result of the implementation of either the proposed SRC or the proposed RCP. Please explain all assumptions and provide all analyses, data or documentation which underlie or support these estimates.

It appears that Dr. Selwyn does not accept Bell Atlantic's estimate that it would take Bell Atlantic 24 to 36 months to implement rate center consolidation in eastern Massachusetts. Please provide Dr. Selwyn's estimates for how long it would take to implement his Single Rate Center ("SRC") or Regional Call Plan ("RCP") proposals, identifying each action that Dr. Selwyn believes must be undertaken to implement each proposal, specify how long he believes each such action would take to accomplish, and explain the basis for his estimates. Please explain all assumptions and provide all analyses, data or documentation which underlie or support these estimates.

Dr. Selwyn recognizes that his proposed Single Rate Center ("SRC") proposal would eliminate the intraLATA toll market in Massachusetts, and that his proposed Regional Call Plan ("RCP") would substantially reduce the intraLATA toll market. (See Dr. Selwyn's 10/29/99 Rebuttal Testimony, at 13.) Please provide any analysis made or relied upon by Dr. Selwyn regarding the benefits to Massachusetts consumers from an increasingly competitive intraLATA toll market, and the impact upon consumers from either eliminating that market under the SRC, or substantially reducing that market under the RCP. Please explain all assumptions and provide all data or documentation which underlie or support any such analysis.

In Footnote 18 of his Rebuttal Testimony, at pages 12-13, Dr. Selwyn states that his two rate center consolidation proposals "expressly contemplate continued participation by competing carriers in the provision of usage services within Eastern Massachusetts, in which case the Company would continue to realize access service revenues." Dr. Selwyn then refers in this footnote to his comments during the July 13, 1999, technical session, at pages 398-399, where he stated as follows:

"With respect to the concerns about competition, I would remind you that the Attorney General's office expressly recommends that as part of the single-rate-center consolidation plan, if that is adopted, that the Department concurrently establish a mechanism whereby competition could be introduced for all LATA usage within that single-rate-center plan by developing some form of access-charge process that would permit other carriers to permit subscribers to select as their primary intraLATA carrier other carriers and that all intraLATA calls would be directed to that carrier; that the carrier would then process those calls much as it might process intraLATA toll calls today and pay to Bell Atlantic an access charge that is geared to the fact that these are now all local calls."

In sum, it appears that Dr. Selwyn believes that, once the intraLATA toll market were eliminated under the Single Rate Center ("SRC") plan or substantially reduced under the Regional Call Plan ("RCP") proposals, the Department could nonetheless create the functional equivalent of a competitive intraLATA toll market by allowing Bell Atlantic customers to pre-select other carriers to provide intraLATA "usage services."

Please provide a full and detailed explanation of Dr. Selwyn's proposal for how such a competitive market for intraLATA "usage services" could be created under his SRC or RCP proposals, including but not limited to: (i) a full explanation of what this market for intraLATA "usage services" would consist of; (ii) the size of this market, in terms of minutes of use and revenues under current and projected rates; (iii) the nature, basis, and precise magnitude of the "access charge" that Dr. Selwyn anticipates having competitive carriers pay to Bell Atlantic; and (iv) what relationship, if any, that this new "access charge" would have to existing reciprocal compensation rates or existing intraLATA switched access rates. Please describe in detail all assumptions and provide all data or documentation which underlie or support this explanation.

In voicing his opinions in this Docket regarding rate center consolidation in

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eastern Massachusetts, what assumptions or conclusions did Dr. Selwyn make regarding the size of the intraLATA toll market today in the eastern Massachusetts LATA? Please provide all data or documentation which support Dr. Selwyn's understanding of the size of the intraLATA toll market in eastern Massachusetts.

In footnote 24 of his Rebuttal Testimony, at pages 15-16, Dr. Selwyn suggests that rate center consolidation could reduce Bell Atlantic's administrative costs. Please provide Dr. Selwyn's estimates of the impact of his Single Rate Center ("SRC") and Regional Call Plan ("RCP") proposals on: (i) the administrative costs of Bell Atlantic; or (ii) the administrative costs of other carriers. Please explain all assumptions and provide all analyses, data or documentation which underlie or support these estimates.

Why does the number of flat rate customers assumed in Table 1 of Dr. Selwyn's Rebuttal Testimony at page 32 (1,230,876) differ from the number of flat rate customers assumed in Table 2 on the following page (1,223,934)?

Respectfully submitted,

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Dated: December 30, 1999.

CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of the above document to be served upon the attorney of record for each other party on December 30, 1999.

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